

COMPLAINT
EXHIBIT D

LAW OFFICES OF JERRY C. EFFREN

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November 17, 2020

Via Email (terri.blair@navy.mil)

FOIA Coordinator
Terri Blair
471 East C Street, SP-30
Norfolk, VA 23518

**Re: FREEDOM OF INFORMATION ACT REQUEST
FOIA REQUEST: DON-NAVY-2020-011031**

Dear Ms. Blair:

I write in response to your interim response dated November 17, 2020 to the above-referenced Request. The single page of the Certificate of Capacity that you sent me does not satisfy my request relative to Request Nos. 1 or 2. Please forward the entirety of the Certificate of Capacity, which must include the page titled "Table 1 – Alabama FDD Line Load Rating and Maximum Allowed Head Pressure on Pontoon Deck". If HDD submitted an amended or revised Table 1 at any time during the 2020 calendar year, or if it re-certified the dock, I need those documents as well.

The delay in response has made it very difficult for my client. Given the passage of time, I cannot wait any longer for documents responsive to Requests Nos. 3 to 6. Please forward those documents as well.

Please confirm receipt of this letter.

Very truly yours,

LAW OFFICES OF JERRY C. EFFREN


Neal J. Bingham

cc: Client